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January 10, 2001

Jane E. Henney, M. D.  
Commissioner  
U. S. Food & Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857-0001

Dear Dr. Henney:

We met last spring, sat next to each other, at Hal Slavkin's farewell dinner.

I am writing as a member of the Union of Concerned Scientists, and I am concerned, very much so, over the tons and tons of antibiotics being fed to livestock and poultry in the United States. Surely the antibiotics are being passed on to humans!

I have a long history of opposition to the indiscriminate use of antibiotics. During World War II I was a dentist assigned to U. S. Army Air Corps hospitals. I was fortunate to be chosen to help form the first Air Corps unit limited to periodontal therapy. We spent a good deal of our time treating acute necrotizing ulcerative gingivitis, in army parlance at the time—Stomatitis Vincents. Believe it or not, our only antibacterial was a copper sulfate mouthwash. And then in 1945, along came penicillin, confined to use by the armed forces. We soon learned to make up a penicillin mouthwash from the crystals and saline (the soldiers swore it was urine). It worked wonders! In one day the bacterial acute phase of the stomatitis was gone! Then we could go ahead and further treat the patients against recurrence.

After the war I continued use the penicillin mouthwash in private practice. But early on warnings started to appear about bacterial resistance and patient sensitivity. So, when I started my advanced training at the University of Michigan I chose as my Master's thesis the development of a substitute for penicillin in the treatment of ANUG. Working with the Parke Davis Co. I started using Tyrothricin, really the only other antibiotic then available but one that could not be used parenterally or orally. I had plenty of patients from the university, especially during and following exam week. Unfortunately, Tyrothricin proved no more effective than the placebos. By that time, procaine-penicillin had been developed and we started IM therapy.

Mind you, Dr. Henney, that was 53 years ago, and the problem has grown worse not better. We are running out of time and ingenuity in our race with mutations of the "bugs."

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**I believe it imperative that a federal antibiotic reporting system be developed that will accurately chronicle the widespread use of antibiotics in agriculture. Moreover, I feel it is the duty of the Food & Drug Administration to monitor the use of antibiotics in human consumption. Between the two, and to quote the UCS, we must "develop the data that are necessary for scientists to explore the links between antibiotic use and the development of drug resistance, and for developing rational strategies to curb use."**

**Thank you, Dr. Henney, for your dedicated service to this nation. I only wish we had more like you!**

**Fraternally,**

A handwritten signature in cursive script that reads "John I. Ingle". The signature is written in black ink and is positioned above the printed name.

**John I. Ingle, D.D.S., M.S.D.**

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